

| Michael K. Yarnoff (admitted <i>Pro Hac Vice</i>) John A. Kehoe (admitted <i>Pro Hac Vice</i>) | |
|--|--|
| Bharati O. Sharma | |
| BARROWAY TOPAZ KESSLER MELTZER & CHECK, LLP | |
| 280 King of Prussia Road | |
| Radnor, PA 19087 | |
| Telephone: 610-667-7706 | |
| Facsimile: 610-667-7506 myarnoff@btkmc.com | <u>*E-FILED - 5/7/09*</u> |
| jkehoe@btkmc.com | |
| bsharma@btkmc.com | e . |
| | |
| Co-Lead Counsel | |
| Joseph C. Kohn (admitted <i>Pro Hac Vice</i>) | Joseph J. Tabacco, Jr. (Bar No. 75484) |
| Denis F. Sheils (admitted <i>Pro Hac Vice</i>) | Nicole Lavallee (Bar No. 165755) |
| William E. Hoese (admitted <i>Pro Hac Vice</i>) | Julie J. Bai (Bar No. 227047) |
| KOHN SWIFT & GRAF, P.C. | BERMAN DeVALERIO |
| One South Broad Street, Suite 2100 Philadelphia, PA 19107 | 425 California Street, Suite 2100 San Francisco, CA 94104 |
| Felephone: 215-238-1700 | Telephone: 415-433-3200 |
| Facsimile: 215-238-1968 | Facsimile: 415-433-6382 |
| kohn@kohnswift.com | jtabacco@bermandevalerio.com |
| dsheils@kohnswift.com | nlavallee@bermandevalerio.com |
| whoese@kohnswift.com | jbai@bermandevalerio.com |
| Co-Lead Counsel | Liaison Counsel |
| [Additional counsel appear on signature page] | |
| UNITED STATES | DISTRICT COURT |
| NORTHERN DISTR | ICT OF CALIFORNIA |
| SAN JOS | E DIVISION |
| | |
| IN RE MARVELL TECHNOLOGY GROUP, |) Master File No. C-06-06286 RMW |
| LTD. SECURITIES LITIGATION |) CLASS ACTION |
| |)) STIPULATION AND [XXOYSSEX)] |
| | ORDER REGARDING LEAD |
| • | PLAINTIFFS' DEADLINE TO FILE |
| | MOTION FOR CLASS CERTIFICATION |
| THIS DOCUMENT RELATES TO: |) Han Danald M. Whata |
| All Actions |) Hon. Ronald M. Whyte |
| All Actions | , |
| | |
| | |
| | |
| | |

LD PLFS' DEADLINE FOR FILING MTN FOR CLASS CERT

Case 5:06-cv-06286-RMW Document 276 Filed 05/07/09 Page 2 of 7

| 1 | Defendants Marvell Technology Group, Ltd. ("Marvell"), Dr. Sehat Sutardja, Weili Dai, and |
|----|--|
| 2 | George Hervey (collectively "Defendants") and Lead Plaintiffs Police and Fire Retirement System o |
| 3 | the City of Detroit, Monte Paschi Asset Management S.G.R. S.p.A, and Puerto Rico Governmen |
| 4 | Employees Retirement System ("Lead Plaintiffs"), by and through their respective counsel hereby |
| 5 | recite and stipulate, subject to court approval, as follows concerning Lead Plaintiffs' Deadline fo |
| 6 | Filing their Motion for Class Certification. |
| 7 | WHEREAS, on March 11, 2009, Lead Plaintiffs served by U.S. mail their First Set of Request |
| 8 | for Admission and Interrogatories concerning class certification matters upon the Defendants; |
| 9 | WHEREAS, Defendants' Objections and Responses to Lead Plaintiffs' First Set of Request |
| 10 | for Admission and Interrogatories accordingly were due on April 13, 2009; |
| 11 | WHEREAS, the parties stipulated and agreed that Defendants would have an additional two |
| 12 | weeks, until April 27, 2009, to serve their Objections and Responses to Lead Plaintiffs' First Set of |
| 13 | Requests for Admission and Interrogatories; |
| 14 | WHEREAS, the parties Stipulated and the Court Ordered on April 21, 2009 that Lead |
| 15 | Plaintiffs' Motion for Class Certification was due to be filed and served on April 29, 2009; |
| 16 | WHEREAS, Lead Plaintiffs received Defendants' Objections and Responses to Lead |
| 17 | Plaintiffs' First Set of Requests for Admission and Interrogatories on April 27, 2009 and require |
| 18 | additional time to review said documents prior to filing Lead Plaintiffs' motion for class certification |
| 19 | and |
| 20 | WHEREAS, the parties have stipulated and agreed that Lead Plaintiffs shall have one |
| 21 | additional week, or until May 6, 2009, to file and serve their Motion for Class Certification; |
| 22 | |
| 23 | |
| 24 | |
| 25 | |
| 26 | |
| 27 | |

28

Case 5:06-cv-06286-RMW Document 276 Filed 05/07/09 Page 3 of 7

| 1 | NOW THEREFORE, the undersigned parties hereby stipulate and agree, subject to the Court's | | |
|----|--|--|--|
| 2 | approval, that Lead Plaintiffs shall have until May 6, 2009 to file and serve their Motion for Class | | |
| 3 | Certification. | | |
| 4 | Dated: April 28, 2009 | BARROWAY TOPAZ KESSLER MELTZER | |
| 5 | | & CHECK LLP | |
| 6 | | /s/ Michael K. Yarnoff MICHAEL K. YARNOFF | |
| 7 | | John A. Kehoe Bharati O. Sharma | |
| 8 | | 280 King of Prussia Road Radnor, PA 19087 | |
| 9 | | Telephone: 610-667-7706 Facsimile: 610-667-7506 | |
| 10 | | Joseph C. Kohn (admitted <i>Pro Hac Vice</i>) | |
| 11 | | Denis F. Sheils (admitted <i>Pro Hac Vice</i>) William E. Hoese (admitted <i>Pro Hac Vice</i>) | |
| 12 | | KOHN SWIFT & GRAF, P.C. One South Broad Street, Suite 2100 | |
| 13 | | Philadelphia, PA 19107 Telephone: 215-238-1700 | |
| 14 | | Facsimile: 215-238-1968 | |
| 15 | | Co-Lead Counsel for Lead Plaintiffs | |
| 16 | | Joseph J. Tabacco, Jr. (Bar No. 75484) Nicole Lavallee (Bar No. 165755) | |
| 17 | | Julie J. Bai (Bar No. 227047) BERMAN DeVALERIO | |
| 18 | | 425 California Street, Suite 2100 San Francisco, CA 94104 | |
| 19 | | Telephone: 415-433-3200 Facsimile: 415-433-6382 | |
| 20 | | Liaison Counsel for Lead Plaintiffs | |
| 21 | Dated: April 28, 2009 | WILSON SONSINI GOODRICH & ROSATI | |
| 22 | Dated. April 20, 2009 | Professional Corporation | |
| 23 | | /s/ Gregory L. Watts GREGORY L. WATTS | |
| 24 | | Steven M. Schatz Boris Feldman | |
| 25 | | Rodney G. Strickland, Jr. | |
| l | | 650 Page Mill Road Palo Alto, CA 94304-1050 | |
| 26 | | Telephone: 650-493-9300 | |
| 27 | | Attorney for Defendant Marvell Technology Group, Ltd | |
| 28 | | | |

[C-06-06286-RMW] STIP. & [RECEPTION ORDER RELD PLFS' DEADLINE FOR FILING MTN FOR CLASS CERT

Case 5:06-cv-06286-RMW Document 276 Filed 05/07/09 Page 4 of 7

| 1 | Dated: April 28, 2009 | QUINN EMANUEL URQUART OLIVER & HEDGES, LLP | |
|----|---|---|--|
| 2 | | | |
| 3 | | /s/ Diane Doolittle | |
| 4 | | DIANE DOOLITTLE John Potter | |
| 5 | | 555 Twin Dolphin Drive, Suite 650 Redwood Shores, CA 94065 | |
| 6 | | Telephone: 650-801-5000 | |
| 7 | | Counsel for Defendant Dr. Sehat Sutardja | |
| | Dated: April 28, 2009 | PAUL, WEISS, RIFKIND, WHARTON | |
| 8 | | & GARRISON, LLP | |
| 9 | | /s/ Michele Hirshman | |
| 10 | | MICHELE HIRSHMAN Theodore V. Wells, Jr. | |
| 11 | | Charles E. Davidow | |
| 12 | | 1285 Avenue of the Americas New York, NY 10019-6064 | |
| 13 | | Telephone: 212-373-3000 | |
| 14 | | Counsel for Defendant Weili Dai | |
| | Dated: April 28, 2009 | BERGESON, LLP | |
| 15 | | | |
| 16 | | /s/ Caroline McIntyre CAROLINE McINTYRE | |
| 17 | | Dan Bergeson 303 Almaden Boulevard, Suite 500 | |
| 18 | | San Jose, CA 95110-2712 | |
| 19 | | Telephone: 408-291-6200 | |
| 20 | | Counsel for Defendant George Hervey | |
| 21 | CENEDAL ODDED 45 A TERESTRATION | | |
| | GENERAL ORDER 45 ATTESTATION | | |
| 22 | I, Nicole Lavallee, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Regarding Lead Plaintiffs' Deadline To File Motion For Class | | |
| 23 | Certification. In compliance with General Order 45, X.B., I hereby attest that Michael K. Yarnoff, Gregory L. Watts, Diane Doolittle, Michael Hirshman, and Caroline McIntyre have | | |
| 24 | concurred in this filing. | co, manage management, and caromic money to have | |
| 25 | Dated: April 28, 2009 | /s/ Nicole Lavallee | |
| 26 | | NICOLE LAVALLEE | |
| 27 | | | |
| 28 | | | |
| 20 | | | |

PROPOSED ORDER

Pursuant to the foregoing stipulation, and good cause appearing,

IT IS HEREBY ORDERED that Lead Plaintiffs shall have until May 6, 2009 to file and serve

their Motion for Class Certification.

Dated: 5/7/09

Ronald M. Whyte

The Honorable Ronald M. Whyte United States District Judge

CERTIFICATE OF SERVICE 1 I, Tyler Kelly, declare that I am over the age of 18 years and not a party to this action. My 2 business address is 425 California Street, Suite 2100, San Francisco, California 94104. On April 28, 3 4 2009. I caused to be served true copies of the STIPULATION AND [PROPOSED] ORDER MOTION FOR CLASS REGARDING LEAD PLAINTIFFS' DEADLINE TO FILE 5 CERTIFICATION on the following by placing same in sealed envelopes with proper first class 6 postage affixed, addressed as shown below, and depositing them in the United States Mail: 7 8 Charles E. Davidow PAUL WEISS RIFKIND WHARTON & GARRISON LLP 9 2001 K Street, NW Washington, DC 20006-1047 10 Michele Hirshman 11 PAUL WEISS RIFKIND WHARTON & GARRISON LLP 1285 Avenue of the Americas 12 New York, NY 10019-6064 - 13 Steven M. Schatz Boris Feldman 14 Rodney G. Strickland, Jr. **Gregory Lewis Watts** 15 WILSON SONSINI GOODRICH & ROSATI 650 Page Mill Road 16 Palo Alto, CA 94304 17 Caroline McIntyre BERGESON, LLP 18 303 Almaden Blvd., Suite 500 San Jose, CA 95110-2712 19 Stephen E. Taylor 20 Jessica L. Grant TAYLOR & COMPANY LAW OFFICES, INC. 21 One Ferry Building, Suite 355 San Francisco, CA 94111 22 Billie D. Salinas 23 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP 50 California Street, 22nd Floor 24 San Francisco, CA 94111 25 26 27 28

Case 5:06-cv-06286-RMW Document 276 Filed 05/07/09 Page 7 of 7

| Michael K. Yarnoff John A. Kehoe |
|--|
| Bharati O. Sharma |
| BARROWAY TOPAZ KESSLER MELTZER & CHECK, LLP |
| 280 King of Prussia Road Radnor, PA 19087 |
| Joseph C. Kohn |
| Denis F. Sheils William E. Hoese |
| KOHN SWIFT & GRAF, P.C. One South Broad Street, Suite 2100 |
| Philadelphia, PA 19107 |
| Jeffrey J. Angelovich Bradley E. Beckworth |
| Susan Whatley NIX PATTERSON & ROACH, LLP |
| 205 Linda Drive Daingerfield, TX 75638 |
| I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is |
| true and correct. |
| Executed in San Francisco, California, on April 28, 2009. |
| C = 1000 |
| Tyler Kelly |
| |
| |
| |
| |
| |
| |
| |
| |
| |
| |
| |
| |

28